

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

NORM DETRICK, ET AL.

Plaintiffs,

V.

KCS INTERNATIONAL INC. d/b/a
CRUISERS YACHTS, ET AL.

Defendants.

Case No. 5:24-cv-01154

Hon. Pamela A. Barker

**DEFENDANTS' MOTION FOR THE ADMISSION *PRO HAC VICE* OF
CHRISTINA M. PAUL**

Pursuant to Local Rule 83.5, Defendants Cruisers Yachts, SkipperBud's, Mark Pedersen, Dan Zenz, Todd Riepe, and John Ferfecki, by and through their undersigned counsel, Travis L. Brannon, respectfully move this Court for permission for Christina M. Paul to appear and participate as co-counsel for Defendants in this action *pro hac vice*.

Pursuant to Local Rule 83.5(h) the following information is provided:

Name: Christina M. Paul

Address: K&L Gates LLP
200 South Biscayne Boulevard
Suite 3900
Miami, FL 33131-2399

Phone Number: 305-539-3300

Facsimile Number: 305-358-7095

Email Address: christina.paul@klgates.com

Florida State Bar
Number: 0596876

Defendants' undersigned counsel, Travis L. Brannon, is admitted to practice before this Court. Ms. Paul is a member of K&L Gates LLP, located in Miami, Florida, and has been a member in good standing of the State Bar of Florida since 2002. (*See* Certificate of Good Standing of Christina M. Paul, submitted as Exhibit A concurrently herewith).

Ms. Paul agrees to observe and be bound by the Local Rules and Orders of this Court, including the ethical standards of the Ohio Rules of Professional Conduct adopted by the Supreme Court of the State of Ohio, insofar as those standards are not inconsistent with federal laws. Accordingly, Defendants, by and through undersigned counsel, respectfully requests that this Court issue an Order permitting Christina M. Paul to appear and participate as co-counsel for Defendants in this action *pro hac vice*.

October 22, 2024

Respectfully submitted,

/s/ Travis L. Brannon
Travis L. Brannon (No. 99290)
Christine G. Scherer (No. 101381)
K&L Gates LLP
210 Sixth Avenue
Pittsburgh, PA 15222
Phone: (412) 355-6500
Fax: (412) 355-6501
travis.brannon@klgates.com
christine.scherer@klgates.com

*Attorneys for Defendants Cruisers Yachts,
SkipperBud's, Mark Pedersen, Dan Zenz,
Todd Riepe, and John Ferrecki*

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who have appeared electronically in this case are deemed to have consented to electronic service and are being served on October 22, 2024 with a copy of this document via the Court's CM/ECF system.

/s/ Travis L. Brannon